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FRANCIS BURGA AS THE
8 ADMINISTRATOR OF THE
ESTATE OF MARGELUS BURGA
9

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN JOSE DIVISION**

13 UNITED STATES OF AMERICA,

14 Petitioner,

15 v.

16 FRANCIS BURGA; FRANCIS BURGA AS
17 THE ADMINISTRATOR OF THE ESTATE
OF MARGELUS BURGA; and RUSSELL
18 MANSKY,

19 Respondents.

Case No. 18-CV-01633 BLF (SVK)

**JOINT MOTION TO VACATE MARCH
10, 2020 DISCOVERY HEARING AND TO
ADOPT SPECIAL MASTER'S REPORT**

Judge: Honorable Susan van Keulen

Honorable Beth L. Freeman

21 On December 18, 2019, the Court ordered the Special Master to provide a written report
22 containing his recommended resolution of the parties' disputes regarding Respondents' privilege
23 claims and any exceptions asserted by the Government with respect to such claims by January 31,
24 2020. In addition, the Court ordered the parties to file objections to or a motion to adopt or
25 modify the Special Master's report by February 14, 2020. The Special Master submitted his report
26 to the parties which was filed under seal with the Court on February 3, 2020.

27 The parties reviewed the Special Master's Report and submitted a Joint Stipulation to
28 Adopt the Special Master's Report on February 14, 2020. On February 27, 2020, Respondent

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1 produced to the Government, fully or in redacted form, as appropriate, any documents identified in
 2 the Special Master's Report as not privileged or only partially privileged.

3 The Court continued the discovery hearing date regarding the Special Master's Report to
 4 March 10, 2020 at 10:00 a.m. The parties have conferred and respectfully request the Court to
 5 vacate the March 10, 2020 hearing date and adopt the Special Master's Report submitted to the
 6 Court under seal on February 3, 2020.

7 Respectfully submitted,

8 DATED: March 4, 2020

SIDEMAN & BANCROFT LLP

9 By: /s/ Jay R. Weill

10 Jay R. Weill

11 Steven M. Katz

12 Travis W. Thompson

13 Attorneys for FRANCIS BURGA; FRANCIS
 14 BURGA AS THE ADMINISTRATOR OF THE
 15 ESTATE OF MARGELUS BURGA

16 DATED: March 4, 2020

RICHARD E. ZUCKERMAN

Principal Deputy Assistant Attorney General

17 By: /s/ Amy Matchison

18 AMY MATCHISON (CA SBN 217022)

19 Trial Attorney, Tax Division

20 United States Department of Justice

21 Attorneys for the United States of America

22 DATED: March 4, 2020

WOOD ROBBINS LLP

23 By: /s/ Denise Mejlszenkier

24 Denise Mejlszenkier

25 Attorneys for Respondent RUSSELL MANSKY

26 **IT IS SO ORDERED**

27 Date: March 4, 2020

28 By: 

SUSAN VAN KEULEN

UNITED STATES MAGISTRATE JUDGE

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ATTESTATION

Pursuant to Civil Local Rule 5.1, I hereby attest that all counsel represented by conformed signatures above have concurred in the filing of this Joint Motion.

DATED: March 4, 2020

SIDEMAN & BANCROFT LLP

By: /s/ Jay R. Weill